

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-mj-02132-Becerra

FILED BY AW D.C.

Jan 19, 2024

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

IN RE SEALED COMPLAINT

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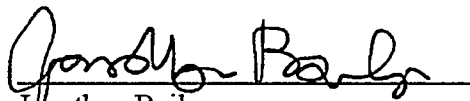
CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard)? No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? No
3. Did this matter involve the participation of or consultation with now Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By:



Jonathan Bailyn
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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Florida

United States of America

v.

Alfred Lenoris Davis,

Defendant(s)

Case No. 24-mj-02132-Becerra

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 13, 2023 in the county of Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

Code Section

18 U.S.C. § 1029(a)(1)

Offense Description

Use of a Counterfeit Access Device

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



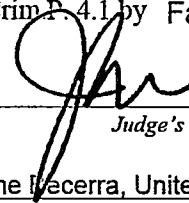
Complainant's signature

FBI SA Adam Weisenstine

Printed name and title

Attested to by the Applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by Face Time.

Date: January 19, 2024 at 1:37 p.m.



Judge's signature

City and state: Miami, Florida

Jacqueline Becerra, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Adam Weisenstine, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigations ("FBI"), in West Palm Beach, Florida, and have been since 2019. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code; that is, an officer of the United States who is empowered by law to conduct investigations and make arrests for offenses enumerated in Titles 8, 18, 19, 21 and 31 of the United States Code. As an FBI Special Agent, I have had training and experience, and have participated and overseen the investigation of white-collar crime, including check fraud, loan fraud, and identity theft.

2. This Affidavit is based upon my personal knowledge, as well as on information provided to me by other law enforcement officers and agencies. Because this Affidavit is submitted for the limited purpose of establishing probable cause, it does not include everything I know about this investigation. Rather, I have set forth only those facts necessary to establish probable cause to believe that on or about April 13, 2023, Alfred Lenoris DAVIS committed the offense of the use of a counterfeit access device, in violation of Title 18, United States Code, Section 1029(a)(1).

PROBABLE CAUSE

3. On April 10, 2023, a lease agreement was e-signed for Unit 2004 at 400 Sunny Isles condominiums in Sunny Isles, Florida. The monthly rent was \$13,000. The tenant's name on the lease was Cynthia Louis, who is DAVIS' mom, according to a birth certificate from the State of Florida.

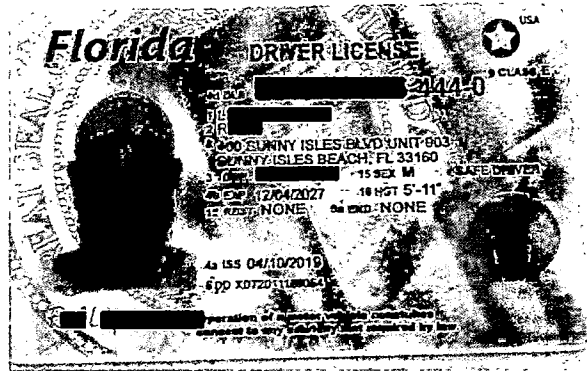
4. The phone number provided in the lease agreement was DAVIS', according to telephone records to which law enforcement has access, and the email provided in the lease agreement was mycynthia422@gmail.com. Google LLC, which hosts gmail.com, does not have servers in the State of Florida.

5. I respectfully submit that there is probable cause to believe that DAVIS created this email address. First, subscriber records for the e-mail address mycynthia422@gmail.com show that the account had been created approximately 10 days before the lease agreement was signed. Second, subscriber records for the e-mail address list DAVIS' phone number as the recovery number, and no other phone numbers are listed for the account. Third, the IP history for e-mail address correspond with the IP history of mobile banking for a personal account, in the name of DAVIS, at Navy Federal Credit Union. For example, on October 6, 2023, an IP address ending in .143 was used to access mycynthia422@gmail.com; on September 30, 2023, the same IP address was used to access DAVIS' personal bank account.

6. On or about April 11, 2023, a separate tenancy agreement was e-signed with the property association for 400 Sunny Isles. The tenant in the agreement was listed as Cynthia Louis, and the phone number listed was DAVIS'. The tenancy agreement included an authorization for Brown's Background Checks to obtain consumer reports related to the applicant's credit and criminal history from Sterling Infosystems, in the State of Ohio.

7. On or about April 13, 2023, DAVIS visited 400 Sunny Isles to provide an identification document to be approved by the property association. DAVIS provided the property association with a driver's license in the name of R.L.

8. The driver's license contained a real Florida driver's license number for Victim 1, which I have confirmed through law enforcement databases, and whom I have identified. The picture on the driver's license, however, was a picture of DAVIS:



9. I have also confirmed through law enforcement databases that the driver's license that DAVIS provided is not an authentic driver's license.

10. In an interview with the assistant manager at 400 Sunny Isles regarding R.L., it was confirmed that a person who calls himself R.L. is a current resident at 400 Sunny Isles, and had also been so in the past at Unit 903. This previous address is reflected on the driver's license that was presented to 400 Sunny Isles on or about April 13, 2023.

11. Further, the only vehicle registered to R.L.'s current condominium unit, 2004, is a Land Rover. Department of Motor Vehicle records list DAVIS and Blackfire Transport LLC as the registered owners of the Land Rover. Department of Motor Vehicle supplemental records associated with Blackfire Transport LLC and the Land Rover list DAVIS as the sole registered agent of Blackfire Transport LLC. Additionally, as of January 17, 2024, Florida Department of State records, at sunbiz.org, list DAVIS as the sole registered agent of Blackfire Transport LLC.


12. On April 13, 2023, using the information about R.L. that DAVIS provided, Brown's Background Check performed a comprehensive criminal search, through securescreening.net, which is operated by National Background Check, Incorporated, in the State of Ohio. The background check for DAVIS, using R.L.'s information, did not yield results for any criminal history. I know, however, from

law enforcement databases to which I have access, that DAVIS has a prior conviction for bank fraud, in violation of federal law.

CONCLUSION

13. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about April 13, 2023, Alfred Lenoris DAVIS committed the offense of the use of a counterfeit access device, in violation of Title 18, United States Code, Section 1029(a)(1).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



ADAM WEISENSTINE
Special Agent
Federal Bureau of Investigations

Attested to in accordance with the
requirements of Fed. R. Crim. P. 4.1
by ~~FaceTime~~, this 19th day of January 2024.
Telephone



HONORABLE JACQUELINE BECERRA
UNITED STATES MAGISTRATE JUDGE